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Attorneys for Plaintiff
LAURA SANTOYO

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

LAURA SANTOYO,

Plaintiff,

v.

RICH PRODUCTS
CORPORATION, a California
Corporation, and DOES 1-10,
inclusive,

Defendants.

Case No. 2:24-cv-1856-JDP

**JOINT STIPULATION FOR
EXTENDING DEADLINE TO
COMPLETE DISCOVERY;
~~PROPOSED~~ ORDER**

Complaint Filed: May 24, 2024

1 LAURA SANTOYO (“Plaintiff”) and RICH PRODUCTS
2 CORPORATION (“Defendant”) (collectively, “the Parties”), by and through their
3 undersigned counsel, hereby stipulate and agree as follows:

4 WHEREAS, the current deadline to complete discovery, pursuant to the
5 Court’s Order of June 24, 2025 (DKT 34) is **December 8, 2025**;

6 WHEREAS, the Parties have been diligent in the discovery process,
7 including through propounding and responding to multiple sets of written
8 discovery and through taking multiple depositions (3 fact witnesses and two expert
9 witnesses to date by Defendant; 10 fact witnesses by Plaintiff);

10 WHEREAS, Defendant deposed Plaintiff’s designated expert on
11 occupational safety and health issues, Charles Craig, on November 18, 2025;

12 WHEREAS, said deposition, due to scheduling issues, was concluded after
13 approximately 3 hours on the record;

14 WHEREAS, Defendant seeks, and Plaintiff does not oppose, a second day of
15 deposition for Mr. Craig;

16 WHEREAS, Mr. Craig’s next availability for deposition is after December
17 15, 2025, which is after the present discovery cutoff, the Parties stipulate as
18 follows:

19
20 IT IS HEREBY STIPULATED and agreed by the Parties hereto, through
21 their respective counsel, that the discovery cutoff in this matter shall be extended
22 by 11 days, up to and through **December 19, 2025**, but only to permit the
23 completion of the deposition of Mr. Craig.

24
25 **IT IS SO STIPULATED.**

26
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28 ///

1 ///
2

Dated: November 20, 2025

GAVRILOV & BROOKS

3
4 By: /s/ Alexandra Darling

Jamie Keeton
Alexandra Darling
Ognian Gavrilo
Attorneys for Plaintiff
LAURA SANTOYO

8
9 Dated: November 20, 2025

HIRSCHFELD KRAEMER LLP

11 By: /s/ Michelle C. Freeman

Monte Grix
Michelle C. Freeman
Attorneys for Defendant
RICH PRODUCTS CORPORATION

14 ATTESTATION

15 In accordance with Local Rule 131(e), the attorney whose signature appears
16 below, and who is e-filing this document, affirms he has obtained authorization and
17 approval from all other counsel listed above to file this document on that counsel's
18 behalf.

19
20 /s/ Michelle C. Freeman

Michelle C. Freeman

27 ///
28

~~[PROPOSED]~~ ORDER

Based upon the foregoing stipulation of the Parties, and good cause appearing therefor, **IT IS HEREBY ORDERED AS FOLLOWS:**

The deadline of December 8, 2025 for the Parties to complete discovery is hereby vacated, with a new deadline of **December 19, 2025** for the express and sole purpose of permitting the completion of Defendant's deposition of Plaintiff's designated expert witness, Charles Craig.

Aside from this new deadline, the Court's Initial Pretrial Scheduling Order (DKT 20), as modified by the Court's Order of June 24, 2025 (DKT 34) remains unchanged.

IT IS SO ORDERED

Dated: December 2, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE

HIRSCHFELD KRAEMER LLP
ATTORNEYS AT LAW
SANTA MONICA